

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

AVAYA INC., )  
                        )  
Plaintiff,         )  
                        )  
-v-                 ) C.A. No. \_\_\_\_\_  
                        )  
SNMP RESEARCH INTERNATIONAL, )  
INC.,                 )  
                        )  
Defendant.         )  
                        )

**MOTION FOR LEAVE TO FILE COMPLAINT  
AND RELATED DOCUMENTS UNDER SEAL**

Plaintiff Avaya Inc. (“Avaya”), by and through its undersigned attorneys, hereby moves this Court for an order in the form attached hereto permitting the filing under seal of the Complaint and exhibits attached thereto, which are contemporaneously submitted to the Court with this Motion. In support of this Motion, Plaintiff states as follows:

Plaintiff seeks to file its Complaint against Defendant SNMP Research International, Inc. (hereinafter “SNMP”) under seal because the Complaint refers to matters, including customer information, that requires protection and confidential treatment. The Complaint and exhibits are attached to this motion as Exhibit A.

The undersigned counsel have personally reviewed the Complaint and exhibits to be filed under seal and believe to the best of their knowledge, information, and belief that the documents should be filed under seal.

OF COUNSEL:

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*/s/ William J. Wade*

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Dated: February 14, 2012